

COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Timothy Durley

v.

Case Number:

(Full name of defendant(s))

Nurse: Robert AHL Borg

(to be supplied by Clerk of Court)

A. PARTIES

1. Plaintiff is a citizen of WISCONSIN, and is located at
(State)

WAUKESHA, WI 53463, 200 S Madison St - WAUKESHA Correctional Institute
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant ROBERT AHL BORG
(Name)

is (if a person or private corporation) a citizen of WISCONSIN

(State, if known)
and (if a person) resides at 2005 Madison, WAUPA, WI, 53963
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Department of corrections: WAUPA Correctional institution
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

1. I Timothy Dureley #463024 am a inmate at waupa
Correctional institution, in WAUPA, WI. 2. on 12-18-20,
while i Timothy Dureley #463024 was residing on A Range
Cell A227 in R Hu, inmate JOVAN MULL #609199
Resided next to me in cell A226. 3. inmate JOVAN
MULL #609199 was Chemically sprayed on the ABOVE
Date. 4. Nurse ROBERT AHL-BORG Appeared on the
Range in front of my cell A227, I asked NURSE
ROBERT AHL-BORG I need my NEBULIZER treatment, &
That i couldnt Breathe & were having trouble Breathing
& that im suppose to Be pulled out & get assess By a

Nurse every time, he said oh & that after he was
Done with inmate Jovan mull he will pull me out &
give me a nebulizer treatment. he walked off. I was
NOT pulled out to be assess NOR given a nebulizer treatment
SO I wrote to Hsu here & the Supervisor concerning this
of why I wasn't pulled out & giving a nebulizer treatment due
to me being a severe asthmatic, they reply was I never
told staff nor a nurse, which is a lie, because hallway
camera will show nurse Robert Ahlberg stepped up to my door
& week's later nurse Robert Ahlberg updated my health
chart saying i Timothy Durley asked for a nebulizer treatment.
6. im suing nurse Robert Ahlberg at his fullest capacity
individually for failure to provide Adequate medical
treatment, due to me not being pulled out & assess &
giving a nebulizer treatment, I've have trouble ^{Breathing} ~~Breath~~
parts of the day & at night & trouble sleeping because of
this. nurse Robert Ahlberg were made aware of my
asthmatic needs & ignored them which is a violation
of my 8th Amendment DiliBeeate indifference & failure
to provide Adequate medical treatment.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is

\$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

im suing NURSE ROBERG AHLBORG at his
fullest capacity & individually for 75,000 in
compensatory damages & 12,000 for punitive
damages & im also requesting that he resigns
from working at WAUKA Correctional Institution

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 7th day of February 2021.

Respectfully Submitted,

Timothy Durley
Signature of Plaintiff

463024
Plaintiff's Prisoner ID Number

PO Box 351

Waupun, WI 53963
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.